## IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE, EASTERN DIVISION, JACKSON

COACH, INC. and COACH SERVICES, INC.	
Plaintiffs,	)
- V	)
OUR LITTLE SECRET, D/B/A DEBBIE'S NEED FOR BEADS, DEBBIE LEWIS STOCKDALE, OWNER, OFFICER,	) Civil Action No. : 1:12-cv-01274
DIRECTOR OR MANAGER OF OUR LITTLE SECRET, DEBBIE LEWIS STOCKDALE,	Judge: J. DANIEL BREEN
RAMIAH MCDOUGAL, CO-OWNER, OFFICER, DIRECTOR OR MANAGER OF	) Magistrate:
OUR LITTLE SECRET, RAMIAH MCDOUGAL and JOHN DOES 1-100,	Jury Demand Endorsed Hereon
Defendant(s).	,

### REQUEST TO CLERK TO ENTER DEFAULT

Now come Plaintiffs Coach, Inc. and Coach Services, Inc. (hereinafter collectively referred to as "Coach"), by and through its undersigned counsel, pursuant to Federal Rule of Civil Procedure 55(A) and hereby move the Clerk to enter Default against Our Little Secret, Debbie Lewis Stockdale, and Ramiah McDougal. Plaintiffs filed the Complaint in the above-captioned matter on July 8, 2011. After summonses were issued by the Court, they were served upon Defendants Our Little Secret, Debbie Lewis Stockdale, and Ramiah McDougal on December 8, 2012. Verified proofs of service were submitted to this Court on or about December 11, 2012. (See Document Nos. 5-8)

Pursuant to Federal Rule of Civil Procedure 12, Defendants are required to answer or otherwise respond to the Complaint within 21 days after receipt of service, making Defendants' answers or responses due on or about January 2, 2013. To date, the undersigned has not received an answer to the Complaint. Accordingly, Plaintiffs request that the Clerk make an entry of default to permit the Plaintiffs to move for default judgment.

# Respectfully submitted,

# s/J. BRITT PHILLIPS

J. BRITT PHILLIPS (BPR# 20937)

#### **Sutter O'Connell Co.**

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Attorney for Plaintiffs Coach and Coach Services Inc.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on February 21, 2013, a copy of the preceding **Motion for Default Judgment** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. I hereby certify that a true copy of Coach, Inc. and Coach Services, Inc.'s Motion for Default Judgment was forwarded via US Mail to:

Our Little Secret, d/b/a Debbie's Need for Beads c/o Owner, Officer or Director Freedom Center Flea Market Booth #21 193 7 East Wood Street Paris TN 38242

Debbie Lewis Stockdale Owner, Officer, Director or Manager of Our Little Secret Freedom Center Flea Market Booth #21 193 7 East Wood Street Paris TN 38242

Debbie Lewis Stockdale 150 Pinhurrst Lane Paris TN 38242-7125

Ramiah McDougal Co-Owner, Officer, Director or Manger of Our Little Secret Freedom Center Flea Market Booth #21 193 7 East Wood Street Paris TN 38242

Ramiah McDougal 180 Browning Drive Paris TN 38242-5469

s/J. BRITT PHILLIPS
J. BRITT PHILLIPS